

EXHIBIT 8

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

MARK WALTERS,

Plaintiff,

v.

OPENAI, L.L.C,

Defendant.

Case No. 1:23-cv-03122-MLB

AFFIDAVIT OF VINNIE MONACO

I, Vinnie Monaco, hereby declare under penalty of perjury, pursuant to 28 U.S.C. § 1746(2), that the foregoing is true and correct:

1. I am a Privacy Engineer at OpenAI and am competent to make this Affidavit.

2. The facts set forth in this Affidavit are based upon my personal knowledge and my review of documents which OpenAI maintains in the ordinary course of its businesses. I would be willing and able to testify thereto if and when called upon to do so.


3. The document attached to Defendant's Memorandum of Law in Support of Defendant OpenAI's Motion to Dismiss as **Exhibit 6** is a true, complete, and accurate transcript of the relevant interactions between Mr. Fred

Riehl and ChatGPT on May 3, 2023 and May 4, 2023, which OpenAI maintains in the ordinary course of business.

4. The document attached to Defendant's Memorandum of Law in Support of Defendant OpenAI's Motion to Dismiss as **Exhibit 7** is a true, complete, and accurate transcript of the relevant interactions between Mr. Mark Walters and ChatGPT on May 4, 2023, which OpenAI maintains in the ordinary course of business.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on July 21, 2023, in Foster City, California.

This 21st day of July, 2023.



Vinnie Monaco